

March 31, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Meetings**  
**PS Docket No. 14.174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25,**  
**RM-10593**

Dear Ms. Dortch,

On March 30, 2015, Lawrence Freedman, Senior Vice President of WorldNet Telecommunications, Inc. ("WorldNet") met in separate meetings with Mr. Travis Litman, Legal Advisor to the Office of Commissioner Rosenworcel and Mr. Daniel Alvarez, Legal Advisor to the Office of Chairman Wheeler.

In these meetings, Mr. Freedman addressed WorldNet's previously filed comments regarding the Commission's proposed rulemaking with regard to the retirement of copper facilities by incumbent local exchange carriers. Mr. Freedman explained that WorldNet is a locally-owned, Puerto Rico competitive local exchange company that predominantly serves small- and medium-sized business customers in Puerto Rico and that WorldNet does so predominantly through the lease of unbundled ILEC copper facilities. To this end, Mr. Freedman echoed and re-emphasized the points made by WorldNet in its publicly filed comments regarding the Commission's copper retirement rule proposals, focusing particularly on the need for some measure of regulatory scrutiny over proposed ILEC copper retirements and clarity and certainty with regard to the options available to competitors to if and when ILEC copper is retired, including, without limitation, continued access to unbundled ILEC DS0, DS1, and DS3 loops, continued access to facilities that will enable the continued provision of DSL, and the option to purchase ILEC copper facilities subject to certain pre-established guidelines and appropriate regulatory oversight.

Respectfully submitted,



Richard Davis  
Counsel for WorldNet Telecommunications, Inc.

cc: Mr. Travis Litman  
Mr. Daniel Alvarez